

Sage Legal LLC

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June 9, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Vera M. Scanlon, U.S.M.J.
225 Cadman Plaza East
Courtroom 13A South
Brooklyn, NY 11201-1804

Re: Nettles v. Zoom 34 LLC, et al.
Case No.: 1:25-cv-334 (CBA) (MMH)

Dear Judge Scanlon:

This firm represents the Defendant Zoom 34 LLC (“Defendant”) in the above-referenced case. The Defendant writes to respectfully request an extension of time, until Friday, June 27, 2025, to respond to the complaint filed by Plaintiff in this case.

Pursuant to ¶ 2(D) of this Court’s Individual Motion Practices, Defendant respectfully submits that:

- (i) the original deadline to respond to the complaint, according to the docket sheet, was March 21, 2025;
- (ii) there have been no previous requests for an extension;
- (iii) Plaintiff consents to the requested extension of time;
- (iv) Defendant submits that good cause exists based on counsel’s need for additional time to analyze the facts and prepare an appropriate response to the Complaint;

In light of the foregoing, Defendant respectfully submits that this Court should exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(B).

Defendant thanks this Court for its time and attention to this case.

Dated: Jamaica, New York
June 9, 2025

Respectfully submitted,

SAGE LEGAL LLC

By: /s/ Emanuel Kataev, Esq.
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